

Fill in this information to identify the case:

United States Bankruptcy Court for the:

____ District of Delaware
(State)Case number (if known): _____ Chapter 11☐ Check if this is an amended filing**Official Form 201****Voluntary Petition for Non-Individuals Filing for Bankruptcy**

06/24

If more space is needed, attach a separate sheet to this form. On the top of any additional pages, write the debtor's name and the case number (if known). For more information, a separate document, *Instructions for Bankruptcy Forms for Non-Individuals*, is available.

1. Debtor's name MOM CA Investco LLC

2. All other names debtor used in the last 8 years

Include any assumed names, trade names, and *doing business* as names3. Debtor's federal Employer Identification Number (EIN) 8 6 - 4 0 0 6 2 6 3

4. Debtor's address

Principal place of business520 Newport Center Drive # 480
Number StreetNewport Beach, CA 92660
City State ZIP CodeOrange County
County**Mailing address, if different from principal place of business**_____
Number Street_____
P.O. Box_____
City State ZIP Code**Location of principal assets, if different from principal place of business**_____
Number Street_____
City State ZIP Code5. Debtor's website (URL) N/A

Debtor MOM CA Investco LLC Case number (if known) _____
 Name

6. Type of debtor

- ☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP))
☐ Partnership (excluding LLP)
☐ Other. Specify: _____

7. Describe debtor's business*A. Check one:*

- ☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))
☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the above

B. Check all that apply:

- ☐ Tax-exempt entity (as described in 26 U.S.C. § 501)
☐ Investment company, including hedge fund or pooled investment vehicle (as defined in 15 U.S.C. § 80a-3)
☐ Investment advisor (as defined in 15 U.S.C. § 80b-2(a)(11))

C. NAICS (North American Industry Classification System) 4-digit code that best describes debtor. See <http://www.uscourts.gov/four-digit-national-association-naics-codes>.

5 3 1 3

8. Under which chapter of the Bankruptcy Code is the debtor filing?*Check one:*

- ☐ Chapter 7
☐ Chapter 9

☒ Chapter 11. *Check all that apply:*

- ☐ Debtor's aggregate noncontingent liquidated debts (excluding debts owed to insiders or affiliates) are less than \$3,024,725 (amount subject to adjustment on 4/01/25 and every 3 years after that).
☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D). If the debtor is a small business debtor, attach the most recent balance sheet, statement of operations, cash-flow statement, and federal income tax return or if all of these documents do not exist, follow the procedure in 11 U.S.C. § 1116(1)(B).
☐ The debtor is a small business debtor as defined in 11 U.S.C. § 101(51D), and it chooses to proceed under Subchapter V of Chapter 11.
☐ A plan is being filed with this petition.
☐ Acceptances of the plan were solicited prepetition from one or more classes of creditors, in accordance with 11 U.S.C. § 1126(b).
☐ The debtor is required to file periodic reports (for example, 10K and 10Q) with the Securities and Exchange Commission according to § 13 or 15(d) of the Securities Exchange Act of 1934. File the *Attachment to Voluntary Petition for Non-Individuals Filing for Bankruptcy under Chapter 11* (Official Form 201A) with this form.
☐ The debtor is a shell company as defined in the Securities Exchange Act of 1934 Rule 12b-2.

☐ Chapter 12**9. Were prior bankruptcy cases filed by or against the debtor within the last 8 years?**

☒ No

☐ Yes. District _____ When _____ Case number _____
 MM / DD / YYYY
 District _____ When _____ Case number _____
 MM / DD / YYYY

If more than 2 cases, attach a separate list.

Debtor MOM CA Investco LLC
Name

Case number (if known) _____

10. Are any bankruptcy cases pending or being filed by a business partner or an affiliate of the debtor?☐ No☒ Yes.Debtor See attached

Relationship _____

District _____

When _____

MM / DD / YYYY

List all cases. If more than 1, attach a separate list.

Case number, if known _____

11. Why is the case filed in this district?

Check all that apply:

☒

Debtor has had its domicile, principal place of business, or principal assets in this district for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other district.

☐

A bankruptcy case concerning debtor's affiliate, general partner, or partnership is pending in this district.

12. Does the debtor own or have possession of any real property or personal property that needs immediate attention?☒ No☐ Yes. Answer below for each property that needs immediate attention. Attach additional sheets if needed.**Why does the property need immediate attention?** (Check all that apply.)☐

It poses or is alleged to pose a threat of imminent and identifiable hazard to public health or safety.

What is the hazard? _____

☐

It needs to be physically secured or protected from the weather.

☐

It includes perishable goods or assets that could quickly deteriorate or lose value without attention (for example, livestock, seasonal goods, meat, dairy, produce, or securities-related assets or other options).

☐

Other _____

Where is the property?

Number _____

Street _____

City _____

State ZIP Code _____

Is the property insured?☐ No☐

Yes. Insurance agency _____

Contact name _____

Phone _____

Statistical and administrative information**13. Debtor's estimation of available funds**

Check one:

☒

Funds will be available for distribution to unsecured creditors.

☐

After any administrative expenses are paid, no funds will be available for distribution to unsecured creditors.

14. Estimated number of creditors☒ 1-49☐ 50-99☐ 100-199☐ 200-999☐ 1,000-5,000☐ 5,001-10,000☐ 10,001-25,000☐ 25,001-50,000☐ 50,001-100,000☐ More than 100,000

Debtor MOM CA Investco LLC
Name

Case number (if known)

15. Estimated assets

- | | | |
|--|---|--|
| <input type="checkbox"/> \$0-\$50,000 | <input type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion |
| <input type="checkbox"/> \$50,001-\$100,000 | <input type="checkbox"/> \$10,000,001-\$50 million | <input type="checkbox"/> \$1,000,000,001-\$10 billion |
| <input type="checkbox"/> \$100,001-\$500,000 | <input type="checkbox"/> \$50,000,001-\$100 million | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input checked="" type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion |

16. Estimated liabilities

- | | | |
|--|---|--|
| <input type="checkbox"/> \$0-\$50,000 | <input type="checkbox"/> \$1,000,001-\$10 million | <input type="checkbox"/> \$500,000,001-\$1 billion |
| <input type="checkbox"/> \$50,001-\$100,000 | <input type="checkbox"/> \$10,000,001-\$50 million | <input type="checkbox"/> \$1,000,000,001-\$10 billion |
| <input type="checkbox"/> \$100,001-\$500,000 | <input type="checkbox"/> \$50,000,001-\$100 million | <input type="checkbox"/> \$10,000,000,001-\$50 billion |
| <input type="checkbox"/> \$500,001-\$1 million | <input checked="" type="checkbox"/> \$100,000,001-\$500 million | <input type="checkbox"/> More than \$50 billion |

Request for Relief, Declaration, and Signatures

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

17. Declaration and signature of authorized representative of debtor

The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.

I have been authorized to file this petition on behalf of the debtor.

I have examined the information in this petition and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 02/28/2025
MM / DD / YYYY

X /s/ Deba Shyam

Signature of authorized representative of debtor

Deba Shyam

Printed name

Title Manager of MOM CA Manager LLC, sole Managing Manager of MOM CA Investco LLC

18. Signature of attorney

X /s/ Christopher M. Samis

Signature of attorney for debtor

Date 02/28/2025

MM / DD / YYYY

Christopher M. Samis

Printed name

Potter Anderson & Corroon LLP

Firm name

1313 North Market Street, 6th Floor

Number Street

Wilmington

City

(302) 984-6000

Contact phone

DE 19801

State ZIP Code

csamis@potteranderson.com

Email address

4909

Bar number

DE

State

List of Affiliate Debtors Filing Chapter 11 Cases

Debtor	Relationship	District	Filing Date
MOM AS Investco LLC	Affiliate	Delaware	February 28, 2025
MOM BS Investco LLC	Affiliate	Delaware	February 28, 2025
MOM CA Investco LLC	Affiliate	Delaware	February 28, 2025

**WRITTEN CONSENT OF THE SOLE MANAGING MANAGER
OF MOM CA INVESTCO LLC**

February 27, 2025

WHEREAS MOM CA MANAGER LLC, the sole Managing Manager (the “Managing Manager”) of MOM CA INVESTCO LLC, a Delaware Limited Liability Company (the “Company”), does hereby consent to, adopt, and approve by written consent, in accordance with sections 18-302 and 18-404 of the Delaware Limited Liability Company Act, the following resolutions and each and every action affected thereby;

WHEREAS in the business judgment of the Managing Manager, it is desirable and in the best interests of the Company that the Company shall be, and hereby is, in all respects, authorized to file, or cause to be filed, a voluntary petition (a “Bankruptcy Petition”) for relief commencing a case (the “Chapter 11 Cases”) under the provisions of chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”);

WHEREAS the Managing Manager has reviewed and considered information available to it and presented by its advisors, as applicable, regarding the liabilities, assets, and liquidity of the Company, the strategic alternatives available to the Company, and the impact of the foregoing on the financial and operational condition of the Company;

WHEREAS the Managing Manager has reviewed and considered the need for the Authorized Person (as defined below) to take further actions to carry out the intent and purpose of the following resolutions, perform the obligations of the Company under the Bankruptcy Code, and pay fees and expenses in connection with the transactions contemplated by the below resolutions;

WHEREAS the Managing Manager has reviewed and considered certain actions that may have been taken previously by any director, officer, employee, manager, member, or agent of the Company in connection with or with respect to the matters set forth in the below resolutions; and

WHEREAS the Managing Manager desires to approve the following resolutions with respect to the Company.

CHAPTER 11 CASE

NOW, THEREFORE, BE IT RESOLVED that the Managing Manager hereby authorizes and empowers Mark Shinderman (the “Authorized Person”) in the name and on behalf of the Company, to execute and file a petition to commence a case and obtain relief under chapter 11 of the Bankruptcy Code (a case commenced as a result of the voluntary petition, a “Chapter 11 Case” and, collectively and jointly with any cases to be commenced by an affiliate of the company (the “Affiliated Companies”), the “Chapter 11 Cases”) in the Bankruptcy Court and to cause the schedules, lists, applications, pleadings, and other motions, papers, agreements, consents, or documents to be filed, and take any and all actions that they deem necessary or proper to obtain relief from the Bankruptcy Court, including, without limitation, any action necessary to maintain

the operation of the Company's business in the ordinary course.

RETENTION OF PROFESSIONALS

IT IS FURTHER RESOLVED, that the Managing Manager hereby authorizes and empowers the Authorized Person, in the name and on behalf of the Company, to employ or continue to employ certain firms as counsel, consultants, professionals, or financial advisors to the Company as such Authorized Person may deem advisable, appropriate, convenient, desirable, or necessary to represent and assist the Company in carrying out its duties under the Bankruptcy Code, and in connection therewith, that the Authorized Person, with power of delegation, is hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers, and cause to be filed appropriate applications for authority to retain the services of such firms.

IT IS FURTHER RESOLVED, that the Authorized Person be, and hereby is, authorized and directed to employ (a) the law firm of Buchalter, a Professional Corporation ("Buchalter"), as lead restructuring counsel, (b) the law firm of Potter Anderson & Corroon LLP ("Potter Anderson"), as restructuring co-counsel, local counsel, and, to the extent necessary, conflicts counsel, (c) FTI Consulting, Inc. ("FTI"), acting through Mark Shinderman or such other person as may be determined by the Authorized Person, as chief restructuring officer of the Company (the "CRO"), and (d) any other legal counsel, accountant, financial advisor, claims agent, restructuring advisor, broker, or other professional the Authorized Person deems necessary, appropriate, or advisable to retain (together with Buchalter, Potter Anderson, and FTI, the "Retained Professionals") in each case, to represent and assist the Company in carrying out its duties under the Bankruptcy Code, and to take any and all actions to advance the Company's rights and obligations, including filing any motions, objections, replies, applications, or pleadings; and in connection therewith, the Authorized Person, with power of delegation, is hereby authorized and directed to execute appropriate retention agreements, pay appropriate retainers, and to cause to be filed an appropriate application for authority to retain the services of each of the Retained Professionals;

IT IS FURTHER RESOLVED that the Authorized Person be, and hereby is, with power of delegation, authorized, empowered, and directed to execute and file all petitions, schedules, motions, lists, applications, pleadings, and other papers and, in connection therewith, to employ and retain all assistance by legal counsel, accountants, financial advisors, claims agents, and other professionals and to take and perform any and all further acts and deeds that the Authorized Person deems necessary, proper, or desirable in connection with the Company's Chapter 11 Case, with a view to the successful prosecution of such case.

GENERAL

IT IS FURTHER RESOLVED that any and all lawful acts, actions, and transactions relating to the matters contemplated by the foregoing resolutions and done in the name of and on behalf of the Company, which would have been approved by the foregoing resolutions if these resolutions had been adopted before such acts were taken, are hereby in all respects approved and ratified as the true acts and deeds of the Company with the same force and effect as if each such act, transaction, agreement, or certificate has been specifically authorized in advance by resolution

of the Company; and

IT IS FURTHER RESOLVED that the Managing Manager, with respect to the Company, has received sufficient notice of the actions and transactions relating to the matters contemplated by the foregoing resolutions, as may be required by the organizational documents of the Company, or hereby waives any right to have received such notice.

IN WITNESS WHEREOF, the undersigned has executed this Consent as of this 27th day of February, 2025.

MOM CA Manager LLC, sole managing manager of MOM CA Investco LLC

By: /s/ Deba Shyam

Deba Shyam, Manager

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

	X	
	:	
In re:	:	Chapter 11
	:	
MOM CA Investco LLC, ¹	:	Case No. 25- [____] (____)
	:	
Debtor.	:	
	:	
	X	

CORPORATE OWNERSHIP STATEMENT

Pursuant to rules 1007(a)(1) and 7007.1 of the Federal Rules of Bankruptcy Procedure, the following is a list of any corporation, other than a governmental unit, that directly or indirectly owns 10% or more of any class of equity interests in the above-caption debtor.

EQUITY HOLDER	PERCENTAGE OF TOTAL EQUITY
MOM CA Investor Group LLC	80.1%
Mohammed Honarkar	19.9%

¹ The Debtor's mailing address is 520 Newport Center Drive # 480, Newport Beach, CA 92660, and the last four digits of the Debtor's federal tax identification number are 6263.

Fill in this information to identify the case:Debtor name MOM CA Investco LLCUnited States Bankruptcy Court for the: _____ District of Delaware
(State)

Case number (If known): _____

☐ Check if this is an amended filing**Official Form 204****Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders****12/15**

A list of creditors holding the 20 largest unsecured claims must be filed in a Chapter 11 or Chapter 9 case. Include claims which the debtor disputes. Do not include claims by any person or entity who is an *insider*, as defined in 11 U.S.C. § 101(31). Also, do not include claims by secured creditors, unless the unsecured claim resulting from inadequate collateral value places the creditor among the holders of the 20 largest unsecured claims.

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
1	A&S Accounting Solutions 321 5th Street Huntington Beach, CA 92648	Audra L. Purdy 678-404-5539	Professional Services				Unknown
2	Allen Matkins 865 S. Figueroa St., Ste. 2800 Los Angeles, CA	Mike Farrell mfarrell@allenmatkins.com	Professional Services				Unknown
3	Berkeley Research Group LLC 550 Gioe St., Ste. 2150 Los Angeles, CA 90071	Dave M. Johnson 510-285-3300	Professional Services				Unknown
4	BPM LLP 2001 N. Main St., Ste. 360 Walnut Creek, CA 94596	Dave Jorgensen 714-558-3236	Professional Services				Unknown
5	Capitol Corporate Services, Inc. L-4361 Columbus, OH 43260	Lo Saechao lsaechao@capitol-services.com	Professional Services				Unknown
6	Corporate Filings LLC 30 N. Gould St., Ste. 7001 Sheridan, WY 82801	Riley Park 307-459-6380	Professional Services				Unknown
7	CS Disco, Inc. 111 Congress Ave., Ste. 900 Austin, TX 78701	Michael Lafair support@csdisco.com	Professional Services				Unknown
8	Franchise Tax Board PO Box 942857 Sacramento, CA 94257-0511	Malia M. Cohen 1-800-852-5711	Tax				Unknown

Debtor MOM CA Investco LLC
Name

Case number (if known) _____

	Name of creditor and complete mailing address, including zip code	Name, telephone number, and email address of creditor contact	Nature of the claim (for example, trade debts, bank loans, professional services, and government contracts)	Indicate if claim is contingent, unliquidated, or disputed	Amount of unsecured claim If the claim is fully unsecured, fill in only unsecured claim amount. If claim is partially secured, fill in total claim amount and deduction for value of collateral or setoff to calculate unsecured claim.		
					Total claim, if partially secured	Deduction for value of collateral or setoff	Unsecured claim
9	JAMS, Inc. PO Box 845402 Los Angeles, CA 90084	Kimberly Taylor 949-224-1810	Professional Services				Unknown
10	Judicate West 1851 E. First St., Ste. 1600 Santa Ana, CA 92705	Nicole Sammartino King 714-534-1340	Professional Services				Unknown
11	Kendall Brill & Kelly LLP 10100 Santa Monica Blvd., Ste. 1725 Los Angeles, CA 90067	Richard Kendall 310-556-2700	Professional Services				Unknown
12	Marula Capital Group LLC 1901 Avenue of the Stars, Ste. 200 Los Angeles, CA 90067	Wayne Platt wplatt@marlacap.com	Professional Services				Unknown
13	Nano Banc 7755 Irvine Center Dr. Fl. 3 Irvine, CA 92618	Max Predergast mpredergast@nanobanc.com	Bank loans	Contingent Unliquidated Disputed			Unknown
14	Prenovost, Normandin, Dawe & Rocha 2122 N. Broadway, Ste. 200 Santa Ana, CA 92706	Jan Wade jwade@pnbd.com	Professional Services				Unknown
15	Regal Court Reporters 1551 N. Tustin Ave. # 750 Santa Ana, CA 92705	Marissa Halo 714-634-4126	Professional Services				Unknown
16	Sandline Discovery, LLC 105 N. Virginia Ave., Ste. 302 Falls Church, VA 22046	Cara Lemire 571-888-3366	Professional Services				Unknown
17	SETEC Investigations 145 S. Fairfax Ave., Ste. 200 Los Angeles, CA 90036	Todd Stefan 800-748-5440	Professional Services				Unknown
18	Wayne Platt 12180 Greenock Ln. Los Angeles, CA 90049	Wayne Platt wplatt@marlacap.com	Professional Services				Unknown
19							
20							

Fill in this information to identify the case and this filing:

Debtor Name MOM CA Investco LLC

United States Bankruptcy Court for the: _____ District of Delaware
(State)

Case number (If known): _____

Official Form 202**Declaration Under Penalty of Perjury for Non-Individual Debtors**

12/15

An individual who is authorized to act on behalf of a non-individual debtor, such as a corporation or partnership, must sign and submit this form for the schedules of assets and liabilities, any other document that requires a declaration that is not included in the document, and any amendments of those documents. This form must state the individual's position or relationship to the debtor, the identity of the document, and the date. Bankruptcy Rules 1008 and 9011.

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement, concealing property, or obtaining money or property by fraud in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Declaration and signature

I am the president, another officer, or an authorized agent of the corporation; a member or an authorized agent of the partnership; or another individual serving as a representative of the debtor in this case.

I have examined the information in the documents checked below and I have a reasonable belief that the information is true and correct:

- ☐ *Schedule A/B: Assets-Real and Personal Property* (Official Form 206A/B)
- ☐ *Schedule D: Creditors Who Have Claims Secured by Property* (Official Form 206D)
- ☐ *Schedule E/F: Creditors Who Have Unsecured Claims* (Official Form 206E/F)
- ☐ *Schedule G: Executory Contracts and Unexpired Leases* (Official Form 206G)
- ☐ *Schedule H: Codebtors* (Official Form 206H)
- ☐ *Summary of Assets and Liabilities for Non-Individuals* (Official Form 206Sum)
- ☐ *Amended Schedule*
- ☒ *Chapter 11 or Chapter 9 Cases: List of Creditors Who Have the 20 Largest Unsecured Claims and Are Not Insiders* (Official Form 204)
- ☒ Other document that requires a declaration Corporate Ownership Statement

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 02/28/2025
MM / DD / YYYY

☒ /s/ Deba Shyam
Signature of individual signing on behalf of debtor

Deba Shyam
Printed name

Manager of MOM CA Manager LLC, sole Managing
Manager of MOM CA Investco LLC
Position or relationship to debtor